

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
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This document relates to:

Ashton, et al. v. Al Qaeda Islamic Army, et al. No. 02-CV-6977
Burnett, et al. v. Al Baraka Investment & Development Corp., et al., No. 03-CV-5738
Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., No. 04-CV-05970
Federal Insurance Co, et al. v. Al Qaida, et al., No. 03-CV-6978
Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al, No. 04-CV-1923
Euro Brokers Inc., et al., v. Al Baraka, et al., Case No. 04 Civ. 7279

**DECLARATION OF OMAR T. MOHAMMEDI TRANSMITTING DOCUMENTS IN
SUPPORT OF DEFENDANTS WORLD ASSEMBLY OF MUSLIM YOUTH-SAUDI
ARABIA AND WORLD ASSEMBLY OF MUSLIM YOUTH-INTERNATIONAL
OPPOSITION TO PLAINTIFFS MOTION TO COMPEL**

I, Omar T. Mohammedi affirm, under penalty of perjury, as follows:

1. I am an attorney admitted to practice before this Court and the lead counsel presenting Defendants World Assembly of Muslim Youth Saudi Arabia (WAMY SA) and World Assembly of Muslim Youth International (WAMY Int'l), jointly referred to as WAMY. I submit this Declaration to transmit to the Court the following documents submitted in support of WAMY's opposition to Plaintiffs' Executive Committee's (PEC) February 28, 2018 motion to compel.

2. Attached hereto as Exhibit A are true and correct copies of WAMY Int'l response and three supplemental responses to Plaintiffs' document requests.

3. Attached hereto as Exhibit B are true and correct copies of WAMY SA response and six supplemental responses to Plaintiffs' first document request.

4. Attached hereto as Exhibit C is a true and correct copy of WAMY SA supplemental response to Plaintiff second document request.

5. Attached hereto as Exhibit D is a true and correct copy of WAMY SA supplemental document production indices.

6. Attached hereto as Exhibit E is a true and correct copy of WAMY SA September 4, 2012 response to Plaintiffs' third document request.

7. Attached hereto as Exhibit F is a true and correct copy of WAMY SA September 19, 2013 response to Plaintiffs' fourth document request.

8. Attached hereto as Exhibit G is a true and correct copy of Plaintiffs' January 5, 2018 letter to Magistrate Judge Sarah Netburn (DKT # 3856).

9. Attached hereto as Exhibit H is a true and correct copy of WAMY's January 10, 2018 response letter to Plaintiffs' January 5, 2018 letter (DKT # 3862).

10. Attached hereto as Exhibit I is a true and correct copy of WAMY's March 14, 2018 pre meet-and-confer demand letter to Plaintiffs.

11. Attached hereto as Exhibit J is a true and correct copy of Plaintiffs' March 16, 2018 response to WAMY pre meet-and-confer demand.

12. Attached hereto as Exhibit K is a true and correct copy of WAMY's March 19, 2018 reply letter to Plaintiffs pre meet-and-confer.

13. Attached hereto as Exhibit L is a true and correct copy of WAMY's March 22, 2018 letter to Plaintiffs post meet-and-confer.

14. Attached hereto as Exhibit M is a true and correct copy of WAMY index listing Plaintiffs' alleged document requests at issue and WAMY's responses to the allegations.

15. Attached hereto as Exhibit N is a true and correct copy of Magistrate Frank Maas April 25, 2014 Order (DKT # 2852), setting WAMY's discovery period.

16. Attached hereto as Exhibit O is a true and correct copy of Magistrate Judge Frank Maas June 1, 2012 Endorsed Order (DKT # 2614), setting August 30, 2012 document request deadline.

17. Attached hereto as Exhibit P is a true and correct copy of the October 3, 2006 umbrella protective order applicable to this MDL.

18. Attached hereto as Exhibit Q is a true and correct except from the November 16, 2011, MDL 1570 hearing transcript held before Magistrate Judge Frank Maas.

19. Attached hereto as Exhibit R is a true and correct chart of WAMY's response to Plaintiffs' alleged missing annual reports (Plaintiffs' Exhibit 15).

20. Attached hereto as Exhibit S is a true and correct copy of the Declaration of Mohammed Al Khatib, a former WAMY Canada volunteer.

21. Attached hereto as Exhibit T is a true and correct copy of WAMYSA9972-WAMYSA9973, including an English translation.

22. Attached hereto as Exhibit U is a true and correct copy of the Declaration of Ibrahim Abdullah, a former WAMY Int'l, volunteer.

23. Attached hereto as Exhibit V is a true and correct copy of WAMYSA9976-WAMYSA9978 and WAMYSA9795-WAMYSA9797, including an English translation.

24. Attached hereto as Exhibit W is a true and correct copy of WAMYSA065457-WAMYSA065466.

25. Attached hereto as Exhibit X is a true and correct copy of WAMYSA190838-WAMYSA190840.

26. Attached hereto as Exhibit Y is a true and correct of the Declaration of Dr. Abdul Wahab Noorwali, a former WAMY Assistant Secretary General.

27. Attached hereto as Exhibit Z is a true and correct copy of WAMYSA029936 and WAMYSA057782, including an English translation.

28. Attached hereto as Exhibit AA is a true and correct copy of WAMYSA027856, including an English translation.

29. Attached hereto as Exhibit AB is a true and correct copy of WAMYSA061345-WAMYSA061346, including an English translation.

30. Attached hereto as Exhibit AC is a true and correct copy of WAMYSA065181-WAMYSA065185, including an English translation.

31. Attached hereto as Exhibit AD is a true and correct copy of the Declaration of Abdullah bin Laden, a former WAMY Int'l volunteer.

32. Attached hereto as Exhibit AE is a true and correct copy of WAMY's chart in response to Plaintiffs alleged missing reports (Plaintiffs' Exhibit 10).

33. Attached hereto as Exhibit AF is a true and correct copy of WAMY indices in response and supplemental responses to Plaintiffs' first set of document requests, number 48, requesting a list of WAMY publications.

34. Attached hereto as Exhibit AG is WAMY's chart with responses to Plaintiffs alleged missing attachments (Plaintiffs' Exhibit 54).

Dated: New York, New York
March 30, 2018

Respectfully Submitted,

/s/ Omar Mohammedi

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